

(CALIFORNIA
STATE OF PENNSYLVANIA)
Los Angeles) ss.
County of Montgomery)

AFFIDAVIT OF [REDACTED]

I, [REDACTED] being duly sworn, depose and state as follows:

1. The following statements are made voluntarily, of my own free will, and after full consultation with my attorney, Michael Flynn.
2. I hereby acknowledge the consummation of a Mutual Release and Agreement reached between myself and the Church of Scientology of California.
3. In accordance with the terms of said Mutual Release and Agreement, I hereby state that I have returned to the Church of Scientology of California all "documents" of any nature in my possession, custody or control relating to the practices of Dianetics or Scientology, all evidence of any nature acquired or retained for the purpose of any lawsuit or for any other purpose concerning any Church of Scientology or any of the other individuals or entities listed or referred to in the Mutual Release and Agreement, any financial or administrative materials concerning any Church of Scientology or any of the other individuals or entities listed or referred to in the Mutual Release and Agreement, and any materials relating to L. Ron Hubbard, his family, or his estate.
4. The term "documents" as used herein includes but is not limited to all originals, copies and copies derived from but not identical to the original, no matter how prepared, and

all writings, papers, notes, records, books and other tangible things including, by way of example and not of limitation, the following:

- a. Memoranda, notes, calendars, appointment books, shorthand or stenographer's notebooks, correspondence, letters and telegrams, whether received, sent, filed or maintained internally;
- b. Drafts or notes, whether typed, penciled or otherwise, whether or not used;
- c. Minutes, reports or summaries of meetings;
- d. Contracts, agreements, understandings, commitments, proposals or other business records;
- e. Recordings, transcriptions or memoranda or notes made of any telephone or face-to-face oral conversations between or among persons;
- f. Dictated tapes or other sound recordings;
- g. Computer printouts or reports and the applicable program or programs therefor;
- h. Tapes, computer disks, cards, or any other means by which data is stored or preserved electrically, electronically, magnetically or mechanically, and the applicable program or programs therefor (from which the undersigned may reproduce or cause to be reproduced such data in written form);
- i. Pictures, drawings, photographs, slides, films, negatives, charts or other graphic representations;

j. Checks, bills, notes, receipts, or other evidence of payment;

k. Ledgers, journals, financial statements, accounting records, operating statements, balance sheets or statements of accounts.

l. Any publications by the Church of Scientology of California, by Bridge Publications, or by New Era Publications, Inc. or any other Church of Scientology or related entity or individual.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Sworn and subscribed to before me
this 5th day of December, 1986,
~~at Norristown, Pennsylvania.~~ Los Angeles, CA

Jo-Ann A Richardson
Notary Public for the State of
Pennsylvania

